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VIA ECF

The Honorable Laura Taylor Swain
Chief United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Gregoire Tournant, 22 cr. 276 (LTS)

Dear Chief Judge Swain:

We write on behalf of Mr. Tournant to respectfully request an adjournment of the conference scheduled for September 19 at 11:30 am to a date and time convenient for the Court during the week of September 25. In light of the fact that Mr. Levine has a personal issue that may prevent him from attending the conference in person on September 19, we are respectfully seeking an adjournment now out of an abundance of caution and to avoid any potential inconvenience to the Court and the parties. Additionally, and in light of the above, we also respectfully request a short extension of time for the defense to file its second-round motions from Friday, September 15 to no later than Tuesday, September 19. This is Mr. Tournant's second request for an extension of time to file his second-round motions. (ECF No. 84.)

We have conferred with the Government, and the Government has asked that the following language be included in this letter: "The Government opposes a further extension of the motion deadline, which was previously extended by three weeks. The Government prefers to maintain the current pretrial conference date in light of the fact that it is not certain that Mr. Levine would even be unable to attend, nor would the Government oppose accommodating him through video or teleconference."

We thank the Court for its consideration.

Respectfully Submitted,

/s/ Seth L. Levine

Seth L. Levine

Alison M. Bonelli

cc: All Counsel of Record (ECF)